

www.roofcoatings.org

March 8, 2005

Bill Pennington
California Energy Commission
1516 Ninth Street, MS-35
Sacramento, CA 95814

Re: 2005 Building Energy Efficiency Performance Standards Ban Proven Products
That Meet Mandated Radiative Properties.

Dear Mr. Pennington:

The Roof Coatings Manufacturers Association (RCMA) is the trade association representing the producers of bituminous and non-bituminous (acrylic and elastomeric) roof coatings and cements for use in roofing systems. We are writing today to urge the CEC to eliminate certain performance criteria listed in Section 118 of the Title 24 program before they go into effect in October. We feel that there are elements of the program which: 1) cause confusion, 2) are duplicative of existing performance standards; 3) are outside the mandate of this program and 4) will in effect ban proven products that meet the goals of the program.

Specifically, we request that the CEC remove all language and Table 118-C Minimum Performance Requirements For Liquid Applied Roof Coatings that address performance requirements, other than those for reflectivity and emissivity, and stay within the Commission's mandated role of setting energy standards.


Many standards and codes already exist that address performance of roofing coatings and systems. Adding another dual standard will cause unnecessary duplication and confusion among our industry and our customers. The physical properties of a coating required to achieve the reflectivity and emissivity required by Title 24 vary widely depending on the climate, substrate and the type of coating in question. Further, defining a specific set of performance criteria stifles innovation and eliminates working products that have the radiative properties required to achieve the energy standards set under Title 24. We also feel that these criteria fall well outside the mandate of the Commission and could be opposed on these grounds alone. Frankly, we fail to see why our products are being assigned mechanical property requirements, whereas other construction products have not been burdened with similar conditions.

Roof coating technology has existed for over 100 years – white acrylics have existed for 40 - and there are many tested, proven products currently on the market that have consistently delivered the energy saving properties required under Title 24. Yet, many will not meet these new performance specifications and are essentially banned by your program, even though they currently meet the Title 24 reflectivity/emissivity and California Building Code guidelines. We believe that as a basic matter of fairness that performance elements, other than reflectivity and emissivity, be left up to building codes and recognized industry standards. Again as currently written, Title 24 amounts to a ban on many products that meet or exceed the energy criteria set by the CEC.

For these reasons we urge the CEC to remove the performance criteria language from Title 24 and return it to its original and proper intent of setting standards for energy efficiency.

We appreciate your consideration of RCMA's position. Please do not hesitate to contact me at (202) 207-1110 if you would like to discuss this in more detail.

Sincerely,



Reed Hitchcock
Executive Director

cc: Elaine Hebert